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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

ADRIENNE ANDROWSKI, an individual;
Plaintiff,

v.

MID CENTURY INSURANCE COMPANY;
and DOES I through X, inclusive; and ROE
CORPORATIONS I through V, inclusive;
Defendants.

CASE NO.: 2:17-cv-01266-GMN-CWH

STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES
(First Request)

COME NOW, Plaintiff, ADRIENNE ANDROWSKI (hereinafter referred to as "Plaintiff"), by and through her attorneys of record, MATTHEW W. HOFFMANN, ESQ. and the law firm of ATKINSON WATKINS & HOFFMANN, LLP, and Defendant, MID CENTURY INSURANCE COMPANY (hereinafter referred to as "Defendant"), by and through its attorneys of record, SARAH SMITH, ESQ. and the LAW OFFICES OF KARL H. SMITH, and hereby stipulate, agree and make this joint application to extend the discovery deadlines for a period of thirty (30) days, from April 16, 2018 to May 16, 2018. This stipulation is made and based upon the following facts and for the following reasons:

...

1 **I. INTRODUCTION**

2 This action arises from an automobile collision that occurred on November 6, 2015.
3 Plaintiff was traveling northbound on US95, south of the SR582 northbound on-ramp in the number
4 one travel lane. The adverse driver, Constance Stozer, was traveling behind Plaintiff. At said place
5 and time, the adverse driver negligently and carelessly slammed into the rear of Plaintiff's vehicle.

6 The adverse driver's insurance policy did not provide sufficient funds with which to
7 compensate Plaintiff for her injuries and damages. Plaintiff filed a claim for Underinsured
8 Motorists Benefits with Defendant pursuant to the subject policy, and Defendant failed to perform
9 their duties under subject policy by failing to make a reasonable settlement offer or to provide any
10 explanation for their unreasonable offer in a timely manner.

11 **II. DISCOVERY COMPLETED TO DATE**

12 On November 7, 2017, the Court signed the parties' Stipulated Discovery Plan and
13 Scheduling Order, setting forth the following discovery deadlines:

- | | |
|---|-------------------|
| 14 • Initial Expert Disclosure Deadline | February 15, 2018 |
| 15 • Rebuttal Expert Disclosure Deadline | March 16, 2018 |
| 16 • Discovery cutoff | April 16, 2018 |
| 17 • Last day to file dispositive motions | May 16, 2018 |
| 18 • Last day to file Pretrial Order | June 15, 2018 |

19 Trial for this matter has not yet been set.

20 To date, the parties have completed the following discovery:

21 1. Plaintiff served her Initial Disclosures Pursuant to Fed. R. Civ. P. 26 on
22 October 31, 2016.

23 2. Defendant served its Initial Disclosures Pursuant to Rule 26(a)(1) on
24 November 7, 2017.

25 3. A Stipulated Discovery Plan and Scheduling Order was submitted on
26 November 6, 2017 and approved by this Honorable Court on November 7, 2017.

1 4. On November 8, 2017, Defendant served Interrogatories and Requests for
2 Production of Documents and Physical Evidence and Authorization on Plaintiff.

3 5. On November 16, 2017, Plaintiff served her First Set of Interrogatories and First Set
4 of Requests for Production of Documents on Defendant.

5 6. On December 1, 2017, Defendant served its Notice of Deposition on Plaintiff.

6 7. On December 8, 2017, Defendant served its Notice of Independent Medical
7 Examination on Plaintiff.

8 8. On January 4, 2018, Plaintiff served her First Supplemental Disclosures Pursuant to
9 Rule 26(a)(1).

10 9. On January 4, 2018, Plaintiff served her Answers to Defendant's First Set of
11 Interrogatories and Answers to First Set of Requests for Production of Documents and Physical
12 Evidence and Authorizations upon Defendant.

13 **III. DISCOVERY REMAINING**

14 1. Deposition of Defendant Mid Century Insurance Company's NRCP 30(b)(6)
15 Witness(es)

16 2. Depositions of witnesses, as necessary

17 3. Depositions of expert witnesses

18 4. Depositions of Plaintiff's medical providers, as necessary

19 5. The parties may need to conduct further written discovery

20 **IV. REASON DISCOVERY REMAINING WAS NOT CONDUCTED DURING THE**
21 **SCHEDULED DISCOVERY PERIOD**

22 The parties have been diligent in their discovery efforts, including obtaining Plaintiff's
23 medical records, preparing their initial disclosures and supplements thereto, preparing written
24 discovery and responding to the same, and conducting depositions. However, in order to allow
25 Plaintiff and Defendant the opportunity to retain, identify and disclose experts and their reports,
26 Plaintiff and Defendant have agreed to extend the current discovery deadline for thirty (30) days.

1 **V. PROPOSED SCHEDULE**

2 The parties propose the following new deadlines:

- 3 • Initial Expert Disclosure Deadline March 19, 2018
4 • Rebuttal Expert Disclosure Deadline April 16, 2018
5 • Discovery Cutoff May 16, 2018
6 • Last day to file dispositive motions June 15, 2018
7 • Last day to file Pretrial Order July 16, 2018¹

8 **THE FOREGOING IS HEREBY STIPULATED AND AGREED**

9 Dated this 15th day of February, 2018.

Dated this 15th day of February, 2018.

10 ATKINSON WATKINS
11 & HOFFMANN, LLP

LAW OFFICES OF KARL H. SMITH

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27 1 In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall
28 be suspended for thirty (30) days after a decision on the dispositive motions or further
Order of the Court.

ORDER

Based upon the stipulation between the parties, and good cause appearing therefrom, it is hereby ORDERED:

1. That the current discovery cutoff date be extended for a period of thirty (30) days, through and including May 16, 2018.

2. That the disclosure of experts shall occur on or before March 19, 2018.

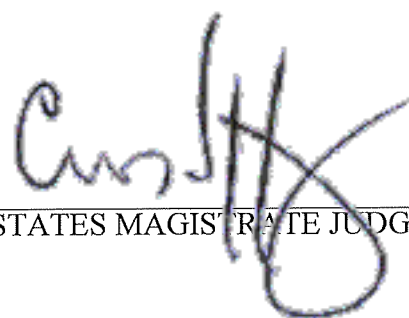
3. The Interim Status Report shall be filed by on or before March 19, 2018.

4. That the disclosure of rebuttal experts shall occur on or before April 16, 2018.

5. That all dispositive motions shall be served and filed no later than June 15, 2018.

6. That the parties Joint Pretrial Order shall be filed with the Court no later than July 16, 2018, unless dispositive motions are filed, in which case the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after the decision of the dispositive motions or further Order of the Court.

DATED: February 16, 2018


UNITED STATES MAGISTRATE JUDGE